ANDREA T. MARTINEZ, Acting United States Attorney (#9313) MICHAEL J. THORPE, Assistant United States Attorney (#11992) Attorneys for the United States of America 111 South Main St., Suite 1800 Salt Lake City, Utah 84111 Telephone: (801)-524-5682

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH	
UNITED STATES OF AMERICA,	FELONY COMPLAINT
Plaintiff,	SEALED Case No.
vs.	Violations: 2:21mj834 DBP
TRYSTIAN BLAYDE WILLIAMS,	COUNT I: 18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm.
Defendant.	U.S. Magistrate Dustin B. Pead

Before Dustin B. Pead, United States Magistrate Judge for the District of Utah, appears the undersigned, who on oath deposes and says:

COUNT I

18 U.S.C. § 922(g)(3)

(Unlawful User in Possession of a Firearm)

On or about November 1, 2021, within the District of Utah,

TRYSTIAN BLAYDE WILLIAMS,

defendant herein, knowing he had been convicted of a crime punishable by imprisonment for more than one year, did knowingly possess a firearm and ammunition, to wit: a Taurus 9mm handgun and associated ammunition, and the firearm and ammunition were in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

Complainant, Michael Coles, being duly sworn, hereby states that this Felony Complaint is based on information obtained through an investigation consisting of the following:

- 1. Your Affiant, Michael Coles, is a Salt Lake City Police Officer assigned to the Robbery/Violent Crimes Unit. Your Affiant has been a police officer since July 2007 and graduated from the Salt Lake City Police Departments Officer Standards and Training Academy (POST) in November of 2007. Your affiant has worked several years in investigating burglary, theft crimes, aggravated assaults, assaults, and robberies, and is currently assigned to the Salt Lake City Police Departments' Robbery and Violent Crimes Unit and is a Task Force Officer with the FBI Violent Crimes Task Force investigating violent crimes against persons. Prior to that, your affiant worked in a patrol function investigating and responding to calls for service. Your affiant has investigated hundreds of cases. Among those cases your affiant has written warrants and seized evidence to be used to link individuals to locations and offenses. Your affiant has written and served numerous search warrants resulting in the seizure of property and information that has led to successful prosecutions. Your affiant has also received specialized training related to current crime trends, crime recognition, and investigative techniques. Your affiant is certified to write search warrants and has completed all necessary associated training.
- 2. On or about November 1, 2021, Salt Lake City police received multiple calls of people shooting guns near the Memory Grove/City Creek area at 941 N City Creek Canyon Road in Salt Lake City, Utah. Witnesses observed and heard several gun shots from two suspects who were also drinking beer near the Amphitheatre area. One witness described yelling at the suspects to stop shooting and then she heard yelling back at her and another

shot that she believed was then being fired at her and her dogs who were below the roadway on the trail. Law enforcement officers were given vehicle and suspect descriptions by witnesses and arriving officers witnessed the suspects getting into their vehicle and pulling away. Based on these descriptions, law enforcement officers conducted a traffic stop and contacted driver O. S. and front seat passenger Trystian Williams.

- 3. Officers verified the identities of the occupants and observed the strong odor of alcoholic beverages emitting from both occupants. Empty beer bottles were observed in the vehicle and had fallen out of the vehicle when the occupants were detained. Officers also observed an empty box of ammunition in the vehicle.
- 4. Officers discovered that Trystian Williams is currently on probation and they conducted a search of his person where they located another box of ammunition in his pants pocket.
 Officers also located a receipt showing the purchase of two boxes of ammunition from earlier on that same date.
- 5. Williams stated to officers that a firearm was in the vehicle. Officers drafted a search warrant and subsequently served the warrant on the vehicle where they recovered a Taurus 9mm handgun in the glove box of the vehicle, in a black holster, directly in front of where Williams had been seated. During the warrant officers also seized the empty box of ammunition
- 6. I conducted an interview with O. S. Post *Miranda* he provided me with video footage that he had taken showing both he and Williams firing the firearm across a ravine at the Memory Grove area. In the video vehicles can be seen driving in the same direction that

the shots are being fired. The video shows Williams fire ten rounds from the gun

emptying the magazine, and then another video shows Williams reloading the magazine.

7. I conducted an interview with Williams and, post *Miranda*, Williams admitted to having

fired the firearm and possessing the ammunition which was found in his pocket during

their search of his person. Williams admitted that he knew he is a convicted felon, and

that he knew he should not be possessing or using a firearm. Williams also admitted to

having consumed alcohol while in possession of the firearm.

8. I verified that Williams is a convicted Felon, is currently on felony probation, and is

therefore restricted from possessing firearms.

9. Based on the foregoing information, your affiant respectfully requests that a felony

complaint and arrest warrant be issued for Trystian Blayde Williams for violations of 18

U.S.C. Section 922(G)(1).

Michael Coles

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Detective, Salt Lake City Police Department

APPROVED AS TO FORM:

ANDREA T. MARTINEZ

Acting United States Attorney

MICHAEL THORPE

Assistant United States Attorney

SUBSCRIBED AND SWORN TO BEFORE ME this 2nd November 2021.

THE HONORÄBLE DUSTIN B. PEAD

United States Magistrate Judge